



# *The Commonwealth of Massachusetts*

## *Office of Campaign & Political Finance*

*One Ashburton Place, Boston 02108*

*727-8352*

*Dennis J. Duffin*  
*Director*

February 18, 1988

AO-88-03

W. Michael Ryan  
District Attorney  
Northwestern District  
Box 268  
Hatfield, MA 01038

Dear Mr. Ryan:

This letter is in response to your recent request for an advisory opinion concerning the application of M.G.L. c.55 to a fundraiser which your committee would like to present as "Pat & Mike's Irish Night". Hampshire County Commissioner Patrick Goggins would be a featured speaker at the fundraiser.

Your committee would incur and pay all expenses, retain all profits and handle promotion, record keeping, solicitations and advertising. Commissioner Goggins' committee would incur no expenses nor receive any benefit in connection with the fundraiser.

Provided all solicitation and promotional materials clearly denominated your committee as the sponsor of the fundraiser and mentioned Commissioner Goggins solely in his role as a featured speaker, it is the opinion of this office that your committee's proposal to hold a fundraiser presented as "Pat & Mike's Irish Night" would comply with the provisions of M.G.L. c.55. We must emphasize that there should be no implication that Commissioner Goggins or his committee is benefiting from the fundraiser. For example, all contributions should be made directly to your committee rather than "Pat & Mike's Irish Night Fundraiser" so that no contributor would mistakenly believe he or she were making a contribution for the benefit of Commissioner Goggins.

Should you have additional questions, please do not hesitate to call this office.

Very truly yours,

*Dennis J. Duffin*  
Dennis J. Duffin  
Director

DJD/ba